

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

COMPETITIVE PRODUCT PRICES
EXPRESS MAIL & PRIORITY MAIL
EXPRESS MAIL & PRIORITY MAIL CONTRACT 2

Docket No. MC2009-12

COMPETITIVE PRODUCT PRICES
EXPRESS MAIL & PRIORITY MAIL CONTRACT 2
(MC2009-12)
NEGOTIATED SERVICE AGREEMENT

Docket No. CP2009-14

**MOTION OF THE UNITED STATES POSTAL SERVICE
FOR TEMPORARY RELIEF**
(February 14, 2012)

In Order No. 1046, issued December 15, 2011, the Commission granted the Postal Service's request for a temporary extension of the contract in the instant docket, until February 15, 2012, or until such time as a successor contract had been approved. The Postal Service and the customer have been working diligently to reach a new agreement over the past two months, to avoid any interruption in the Postal Service's ability to provide this customer access to negotiated rates. However, the Postal Service and the customer were unable to reach an agreement on the terms of the new contract in time for the Postal Service to file the new agreement 15 days prior to February 15, 2012.

Nevertheless, the Postal Service and the customer have now reached agreement on a new contract, and expect to file it with the Commission later this month. The contract has been signed and is currently proceeding through final internal approvals at the Postal Service. Yet because of the timing of the regulatory process, there will be a

window between the expiration of the existing contract in this docket and the effective date of the new contract, while the Commission completes its review. Thus, the customer now faces the prospect of an interruption in its access to negotiated rates as a result of the processes that it must participate in when it does business with the Postal Service, rather than with one of the Postal Service's competitors.

To avoid this result, the Postal Service respectfully requests that the Commission grant an additional thirty-day extension to allow the existing contract to remain in effect until such time as the Commission is able to complete its review of the new agreement. Thus, the proposed extension would only last for a finite and relatively short period of time. In conclusion, for the reasons discussed above, and in consideration of the customers' business continuity, the Postal Service hereby moves for temporary relief to allow the existing contract to remain on the competitive products list until the effective date for the new contract is established.

Respectfully submitted,

UNITED STATES POSTAL SERVICE
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